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Washington, DC 20005

**Donald C. Brittingham**  
Director – Wireless/Spectrum Policy

September 22, 2004

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room TW-A325  
Washington, D.C. 20554

**Re:   *Ex Parte* Presentation**  
**WT Docket No. 03-103; “Air-Ground Telecommunications Services”**

Dear Ms. Dortch:

On September 21, 2004, representatives of Verizon Airfone met with representatives of the Wireless Telecommunications Bureau and the Office of Engineering and Technology to discuss the Commission’s pending rulemaking on the Air-Ground service. A list of the participants in the meeting and a copy of the presentation materials are attached.

In this meeting, Verizon Airfone stressed the importance of implementing an “exclusive use” licensing regime that would facilitate the provision of a Broadband Air-Ground service in the 800 MHz band. As described in the attached presentation, the use of the band sharing techniques proposed by AirCell and Boeing would not support the provision of such a service.

Airfone also provided additional information to supplement the record in this proceeding. Specifically, Airfone provided additional evidence regarding the competitive ATG services being offered (or planned to be offered) by various satellite-based operators. This information supplements a white paper filed by Airfone on Sep. 7, 2004. (A copy of this supplemental information is attached). Airfone also provided a copy of a technical white paper written by Telcordia Technologies (“Broadband Wireless Data and the ‘User Experience’”) that describes the data traffic analysis used to determine the impact of various licensing scenarios on the data throughput delivered “to the seat.” (A copy of this paper is also attached).

There is a considerable demand for Broadband ATG services, and changes to the Commission's rules are needed to meet this demand. Consequently, we urge the Commission to finalize its rulemaking in an expeditious manner.

Pursuant to Section 1.1206(b)(2) of the Commission's Rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket.

Sincerely,

/s/ Donald C. Brittingham  
Donald C. Brittingham

#### Attachments

cc:	Richard Arsenault	Gregory Vadas
	Kathy Harris	Ron Chase
	Jay Jackson	Ahmed Lahjouji
	Lynne Milne	Salomon Satche
	Roger Noel	George Sharp
	Martha Stancill	

**WT Docket 03-103; Verizon Airfone Meeting with FCC on September 21, 2004**

**List of Attendees**

Richard Arsenault, Wireless Telecommunications Bureau (WTB)  
Kathy Harris, WTB  
Jay Jackson, WTB  
Lynne Milne, WTB  
Roger Noel, WTB  
Martha Stancill, WTB  
Gregory Vadas, WTB  
Ron Chase, Office of Engineering and Technology (OET)  
Ahmed Lahjouji, OET  
Salomon Satche, OET  
George Sharp, OET

Don Brittingham, Director-Wireless/Spectrum Policy, Verizon  
Leslie Owsley, Assistant General Counsel, Verizon  
Robert Combs, Director, Verizon Airfone  
David Hilliard, Counsel, Wiley Rein & Fielding LLP  
Tom Dombrowsky, Engineering Advisor, Wiley Rein & Fielding LLP